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IN THE UNITED STATES BANKRUPTCY COURT
CLERK US BANKRUPTCY COUR
DISTRICT OF DELAWARE
FOR THE DISTRICT OF DELAWARE

In re:

FTX Trading Ltd., et al., Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

**Emergency Motion by KaiKai Lin (Appearing Pro Se) to Confirm Entitlement to
September 30, 2025 Distribution and to Set Response Deadline**

The applicant, Kai-Kai Lin (hereinafter “Applicant”), appearing pro se, Account ID 94295605, Unique Customer Code 4297923, respectfully submits this emergency motion seeking relief to ensure the orderly execution of the September 30, 2025 distribution. Applicant has completed all required procedures prior to the registration deadline (including KYC verification, tax documentation submission, and DSP registration on the Kraken platform), and has received email confirmation from Debtor’s counsel Alexa J. Kranzley (kranzleya@sullcrom.com). Kraken DSP users holding Chinese passports and residing abroad who pay taxes overseas received confirmation emails around September 20, 2025 titled “FTX Liquidation Trust – Distribution to DSP Completed,” and their Kraken accounts reflect that FTX has transferred funds to Kraken. Despite multiple inquiries, Applicant has not received similar confirmation, and the personal bond claim page still shows a “Disputed” status, inconsistent with the statements made by Debtor’s counsel.

I. Relief Requested

1. Applicant requests that the Court order the FTX Liquidation Trust (“Trust”) to submit a notice by 12:00 PM (Eastern Time) on September 26, 2025, confirming whether Customer Code 4297923 is included in the September 30, 2025 distribution list via Kraken (Applicant’s selected DSP).

2. If the Trust fails to submit such notice by the deadline, or if no objections are filed by that time, Applicant requests that the Court approve this motion and order the Trust to include Customer Code 4297923 in the September 30, 2025 Kraken distribution list.
3. Applicant requests that the Court adjudicate this motion without a hearing, or alternatively, schedule the earliest possible hearing prior to September 30, 2025, or include this matter in the October 23, 2025 case status conference agenda.

II. Jurisdiction and Venue

4. This Court has jurisdiction pursuant to 28 U.S.C. §§ 157 and 1334; venue is proper under 28 U.S.C. §§ 1408 – 1409. This matter constitutes a core proceeding under 28 U.S.C. § 157(b). Relief is authorized under 11 U.S.C. §§ 105(a), 1142(b), and the Court’s inherent authority to enforce the confirmed plan.

III. Factual Background

5. Applicant is a Class 7A customer (Customer Code 4297923) and has selected Kraken as the DSP, with confirmation from Kraken (Exhibit A).

6. All distribution prerequisites (identity verification, tax documentation, Kraken account registration) have been completed (Exhibit B).

7. On August 20, 2025, Applicant emailed Debtor’s counsel inquiring: “I have changed my place of residence but have not been able to get compensation. Have I met the necessary procedures? Please check and clarify whether I can get the allocation in September.” Counsel Alexa J. Kranzley replied on August 22, 2025: “We have reviewed the submitted materials and you have completed all of the pre-distribution requirements. Subject to final sanctions screening (which is done for all claims prior to distribution), you will be receiving a distribution on account of this claim on September 30, 2025.” (Exhibit C)

8. The FTX Customer Claims Portal shows all steps completed, except Step 9 remains marked “Disputed” (Exhibit D).

9. Around September 20, 2025, similarly situated customers (Chinese passport holders / Hong Kong tax residents; Kraken as DSP) received emails titled “FTX Liquidation Trust – Distribution to DSP Completed,” and their Kraken accounts reflect receipt of funds (Exhibit E).

10. Applicant has not received any similar confirmation. Multiple inquiries to FTX support and Trust counsel yielded only templated responses without substantive information (Exhibit F).

11. With the September 30 distribution imminent, a clear confirmation is needed to avoid exclusion of eligible creditors and ensure equal treatment.

12. This motion relates to Applicant's prior submission (Docket No. 31148), which the Court has included in the October 23, 2025 case status conference materials.

IV. Grounds for Relief and Urgency

13. The relief sought is procedural and narrowly tailored: it requests confirmation by a specific date that Applicant has met all distribution requirements.

14. Response deadline and CNO compliance: Applicant requests a response deadline of 12:00 PM ET on September 26, 2025, allowing the Court to issue an order approving the motion if no response is filed. Under local rules, a Certificate of No Objection (CNO) may be filed 24 hours after the objection deadline. If the Court requires a CNO, the September 26 deadline allows submission by September 27, still leaving sufficient time for adjudication before the September 30 distribution. To avoid prejudice from the 24-hour gap, Applicant respectfully requests that the Court approve the motion if no response is received by the deadline.

WHEREFORE, Applicant respectfully requests that the Court approve the proposed order attached hereto and grant such other relief as it deems just and proper.

Dated: September 24, 2025

Lin kaikai (pro se) 

Customer Code: 4297923

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX Trading Ltd., et al., Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

**ORDER GRANTING EMERGENCY MOTION TO CONFIRM INCLUSION IN THE
SEPTEMBER 30, 2025 DISTRIBUTION (CUSTOMER CODE 4297923) AND
SETTING DATE-CERTAIN RESPONSE DEADLINE**

Upon the motion (the "Motion") of Kaikai Lin (pro se), Customer Code 4297923; and good cause appearing; it is ORDERED that:

1. On or before September 26, 2025 at 12:00 p.m. Eastern Time, the FTX Recovery Trust (or its administrator) shall file a notice on the docket confirming whether Customer Code 4297923 is included in the September 30, 2025 distribution via Kraken.
2. If no such notice is filed by that deadline, or if no timely objection to the Motion is filed by that deadline, the Motion is DEEMED GRANTED and the FTX Recovery Trust is DIRECTED to include Customer Code 4297923 in the September 30, 2025 distribution via Kraken.
3. The Court retains jurisdiction to enforce and interpret this Order.

Dated: _____, 2025

Wilmington, Delaware

The Honorable Karen B. Owens
United States Bankruptcy Judge

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CERTIFICATE OF SERVICE

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CLERK
US BANKRUPTCY COURT
DELAWA

I hereby certify that on September __, 2025, I caused a true and correct copy of the foregoing Emergency Motion to be served via email on the following parties:

United States Trustee – District of Delaware:

Juliet M. Sarkessian (juliet.m.sarkessian@usdoj.gov)
Benjamin A. Hackman (benjamin.a.hackman@usdoj.gov)
David A. Gerardi (david.gerardi@usdoj.gov)

FTX Recovery Trust (Sullivan & Cromwell LLP):

Amanda S. Dietrich (dietericha@sullcrom.com)
James L. Bromley (bromleyj@sullcrom.com)
Brian D. Glueckstein (gluecksteinb@sullcrom.com)
Alexa J. Kranzley (kranzleya@sullcrom.com)

Delaware Counsel to the FTX Recovery Trust (Landis Rath & Cobb LLP):

Adam G. Landis (landis@lrclaw.com)
Kimberly A. Brown (brown@lrclaw.com)
Matthew R. Pierce (pierce@lrclaw.com)
Matthew B. McGuire (mcguire@lrclaw.com)

Request for Consent / Reservation: By this Certificate and the cover email, Movant requests that counsel confirm consent to service by email for the foregoing papers and any future papers in this case. If any counsel does not consent to service by email, Movant requests to be notified promptly so that alternative arrangements may be made.

Dated: September 24, 2025

Lin kaikai (pro se)

Kaikai Lin

Customer Code: 4297923

EXHIBIT INDEX

Exhibit A — Email (Kraken) confirming DSP onboarding (dated on/before Aug. 22, 2025)

Exhibit B — Screenshot of creditor claims portal showing completion of Steps 1–8

Exhibit C — Email correspondence between creditor and Debtor's counsel

Exhibit D — FTX Claims Portal screenshots showing all steps completed (Step 9 still showing Disputed)

Exhibit E — Redacted copies/screenshots of other creditors' "Completed Distribution to DSP" emails (received Sept. 20, 2025)

Exhibit F — Email threads to FTX support showing non-substantive/template responses

Exhibit A — Email (Kraken) confirming DSP onboarding (dated on/before Aug. 22, 2025)

Confirmation and Next Steps - Upcoming FTX distribution

 Kraken<no-reply@email.kraken.com> ↶ ↷ ↸ ↹ ⌂ ...
收件人: 你 周五 2025/8/22 0:48

kraken

Hi KAIKAI,

We're grateful that you've chosen Kraken as your preferred platform for receiving funds related to the FTX distribution. 

Here's where we are in the process:

- You've created your Kraken account
- Your Kraken and FTX accounts have been successfully linked
- Your Kraken account is properly verified
- All that's left is to wait for FTX to distribute the funds

In terms of timeline and when to expect FTX to distribute the funds, updates will be posted on the [FTX Claims Portal](#) and on the [@FTX_Official X account](#) as soon as the information is available.

Here's why you made the right choice:

- Kraken's legendary security, featuring 24/7 monitoring and assets protected in cold storage.
- Our award-winning support, just a click or call away.
- Trade confidently with some of the deepest liquidity in the market.
- Low fees, where more of your money stays with you.

If you have any issues, our team of specialists are available to help 24/7 via

Exhibit B — Screenshot of creditor claims portal showing completion of Steps 1–8

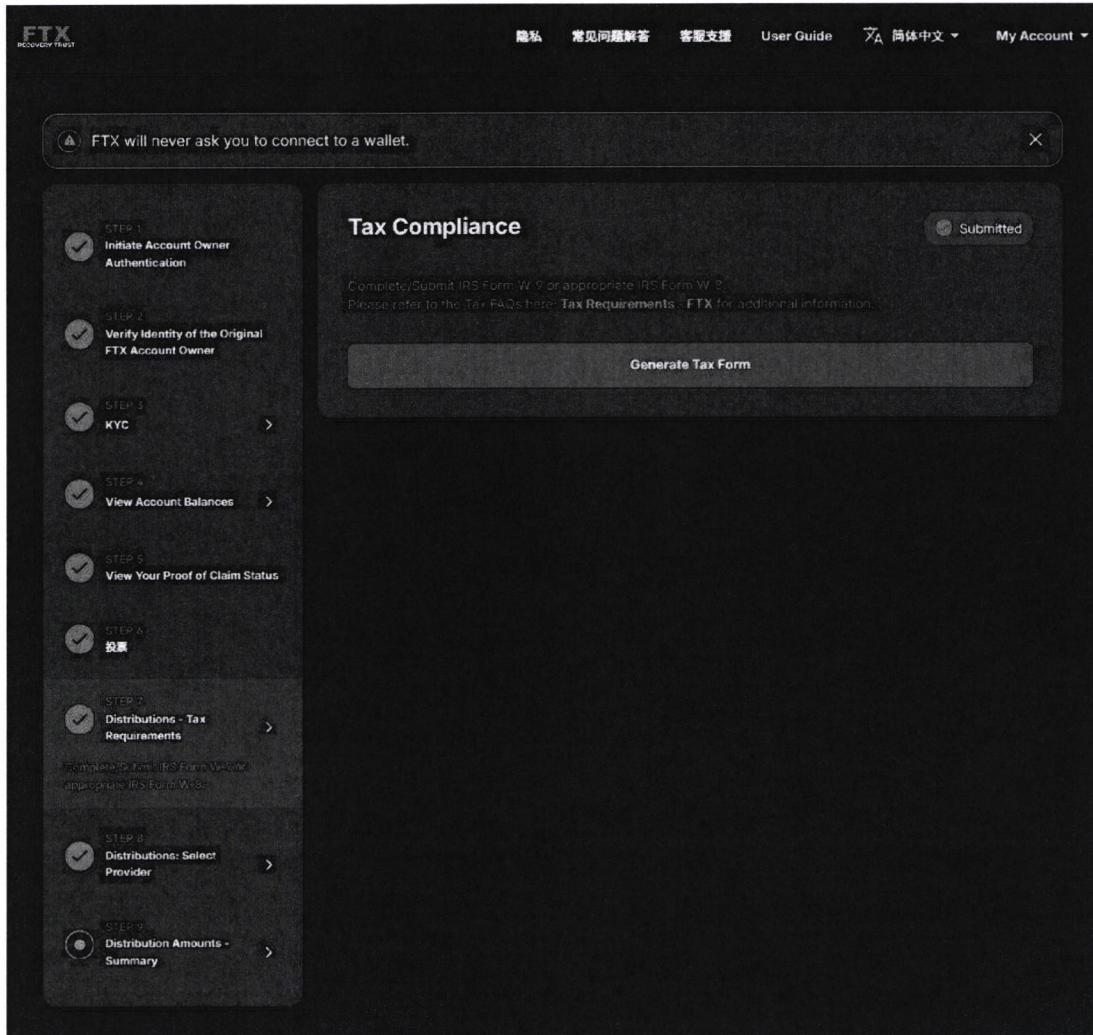


Exhibit C — Email correspondence between creditor and Debtor's counsel

Motion to Lift Payment Restrictions on Chinese Creditors and Ensure Equal Distribution Rights Under the FTX Reorganization Plan

Double K  答复  全部答复  转发  显示原始邮件  打开自动翻译

收件人: bromleyj@sullcrom.com; kranzleya@sullcrom.com; dietdericha@sullcrom.com; + 另外 7 人 周三 2025/8/20 10:14

翻译自 英语

I have changed my place of residence but have not been able to get compensation. Have I met the necessary procedures? Please check and clarify whether I can get the allocation in September.

...

此翻译有帮助吗? 是 否

KJ Kranzley, Alexa J. <kranzleya@sullcrom.com>     周六 2025/8/23 4:42

收件人: 你: Bromley, James L.; Dietderich, Andrew G.; Glueckstein, Brian D.; zzext-landis; zzExt-brown; zzext-pierce 抄送: *FTXClaims

① 你已在 周六 2025/9/20 6:14 答复

此消息的语言为 英语 翻译至 始终不翻译 英语

We have reviewed the submitted materials and you have completed all of the pre-distribution requirements. Subject to final sanctions screening (which is done for all claims prior to distribution), you will be receiving a distribution on account of this claim on September 30, 2025.

Alexa J. Kranzley
[+1 212 558 7893 \(T\)](#) | [+1 917 587 0849 \(M\)](#)

...

Exhibit D — FTX Claims Portal screenshots showing all steps completed (Step 9 still showing Disputed)

The screenshot shows the FTX Claims Portal Distributions Dashboard. On the left, a sidebar lists the following steps:

- STEP 1: Initiate Account Owner Authentication (Completed)
- STEP 2: Verify Identity of the Original FTX Account Owner (Completed)
- STEP 3: KYC (Completed)
- STEP 4: View Account Balances (Completed)
- STEP 5: View Your Proof of Claim Status (Completed)
- STEP 6: 投票 (Completed)
- STEP 7: Distributions - Tax Requirements (Completed)
- STEP 8: Distributions: Select Provider (Completed)
- STEP 9: Distribution Amounts - Summary (In Progress, Disputed)

The main dashboard displays the following information for the Sep 30th Distribution - Convenience Class Customers:

Category	Value	Status
Distribution Method	Kraken	
Est. Distribution Date	TBD	
Claim Classification	TBD	
Claim Status	Disputed	
Distribution Calculation		
Claim Amount	TBD	
Post-Petition Interest Distribution (Tax Withholding)	TBD	
(Forfeited Distribution)	TBD	
Total Distribution		
Recovery % (Prior to Tax Withholding)	TBD	

A note at the bottom states: "The data above is static and pertains solely to the 1st Distribution on September 30, 2025. Any subsequent changes or updates (e.g. tax or distribution service provider) will be reflected in the Distributions Dashboard (Step 9) for the next distribution."

Exhibit E — Redacted copies/screenshots of other creditors' "Completed Distribution to DSP" emails (received Sept. 20, 2025)

7:24    

7:24    

<

We're reaching out with an update on your FTX funds, for which you selected Kraken as a distributor:

- The funds have successfully been distributed from FTX to Kraken.
- Right now, we're working as efficiently as possible through the necessary processing steps to ensure everything is correctly credited to you.
- You can expect the funds to appear in your Kraken account on or around **September 30, 2025**.

You'll receive a confirmation email as soon as the funds have been credited to your account.

If you have any questions, visit our dedicated [support article](#).

Thank you for choosing Kraken - we're excited to keep earning your trust.

distribution amount that you are entitled to receive in this distribution round, in accordance with the Plan's waterfall (such additional distributions, the "Further Distributions").

We have been informed by the Distribution Service Providers that such funds are currently expected to be credited to your account with your selected Distribution Service Provider on or around September 30, 2025.

If you have any questions related to the availability of your funds in your account with the Distribution Service Provider, please contact customer support at your selected Distribution Service Provider.

Without prejudice to the Further Distributions, where applicable, FTX's payment of your distributions to the Distribution Service Provider at your direction satisfies and defeases FTX's obligation to pay such distributions to

Reply    

Reply    

 Mail  Calendar  Apps

 Mail  Calendar  Apps

Exhibit F — Email threads to FTX support showing non-substantive/template responses

[Please use support.ftx.com] Re: I haven't received the notification regarding the distribution of creditor funds yet, while the other creditors have already received theirs.



Giorno (Please use support.ftx.com)

2025/9/20 GMT-7 10:56

Hi there,

Thanks for reaching out.

Please click on the "i" icon for more information as to why your claim status may be marked as "Disputed".

Why is my claim status Disputed?

Any Claim that is not "Allowed" (as defined in Section 2.1.8 of the Confirmed Second Amended Joint Chapter 11 Plan [D.I. 26404, Exhibit A] (the "Plan")) and is not subject to a valid and timely Bahamas Opt-In Election remains a "Disputed Claim" (as defined in the Plan). A Claim may be Disputed due to, among other reasons, the following:

- A proof of claim was filed is still under review and has not yet been reconciled;
- Your jurisdiction is still under review and/or is currently not eligible for distributions;
- You received partial distributions from the FTX Australia proceedings and are still under review to reconcile the remaining amount of your claim.

The confirmed FTX Chapter 11 Plan of Reorganization provides that unless "Allowed" in accordance with the Plan, all claims against the FTX Debtors remain "Disputed." The Plan further provides that the FTX Recovery Trust has until at least January 3, 2026 (one year after the Effective Date) to resolve and reconcile all Disputed Claims and, where necessary, to object to any such claims. The FTX Recovery Trust is currently in the process of reviewing and reconciling hundreds of thousands of claims.

To the extent that additional information is required in connection with the claim, either we, FTX Customer Support, or other professionals of the FTX Recovery Trust will reach out to discuss and to attempt to efficiently resolve any issues.

More information can be found here: <https://support.ftx.com/hc/en-us/articles/34522100742804-Distributions-Dashboard-FAQs>

Thank you,

Extremely Urgent

express

